From:	Joseph Gantos
To:	Santos, Carmen
Cc:	Robert Cronin; Keith Takata; Armann, Steve
Subject:	Re: LBNL Water Treatment System Relocation Spill Prevention Plan - Draft Conditions
Date:	Wednesday, December 07, 2016 8:00:05 PM

Hi Carmen,

Thanks for sharing these conditions in advance. We'll review and let you know if we need to discuss. Please let me know your availability Thursday and Friday in case we need to schedule a call.

Best regards!

Sent from Joe's iPhone

On Dec 7, 2016, at 7:05 PM, Santos, Carmen <Santos.Carmen@epa.gov> wrote:

> Hello Robert, Joe, and Keith,
> Below are draft conditions associated with the continued use of the water storage tanks in the new area to where the water treatment system (WTS) was relocated. We understand the WTS was relocated to the east of former Building 5. We are sharing these draft conditions with you so that you are aware of what they are. If you have concerns with this draft conditions, please call me to discuss. We prefer that approach. As you read the draft conditions, please keep in mind the no unreasonable risk determination that EPA made in Section IV.A of the May 10, 2016 approval (as amended on May 24, 2016) of the LBNL risk-based PCB cleanup application. In context to the relocation of the WTS and continued use of the storage tanks (i.e., influent tanks), EPA needs to be able to sustain the no unreasonable risk determination in the May 2016 Approval when allowing the continued use of the storage tanks at the new WTS location. Moreover, as I explained in my November 21 and 22, 2016 emails regarding the no unreasonable risk determination, EPA is also considering EBMUD's discharge limit for PCBs of 0.017 ug/L, which is more stringent than EPA's unrestricted use level for PCBs in water equal to or below 0.5 ug/L.
> We will be discussing internally the tank containment berm volume for the 21,000 gallon tanks which is one of the issues addressed in one of the draft conditions included below.
> **Draft Conditions for Continued Use of Tanks to Store Water Containing PCBs, New WTS Location**
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> <!--[if !supportLists]-->1. <!--[endif]-->Continued use of the influent storage tanks must not result in unreasonable risk of injury to health or the environment. In the event that EPA cannot sustain the no unreasonable risk determination that it made in the May 2016 Approval, EPA will modify or revoke the Approval. (DRAFT)
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> <!--[if !supportLists]-->2. <!--[endif]-->Liquids to be stored in the influent (storage) tanks are those described in EPA's May 2016 Approval and include water that has accumulated in excavations related to the PCB

remediation at the site and water/hexane mixture from decontamination of equipment and tools that were used at the site during PCB sampling and remediation activities. The water from the excavations include storm water runoff and ground water that may have entered the excavations. (DRAFT)

<!--[if !supportLists]-->3. <!--[endif]-->The containment berms associated with each influent storage tank holding water that contains PCBs must be empty at all times to ensure the maximum calculated containment capacity is maintained in case of a spill or tank release due to a loss in tank structural integrity (e.g., damaged seams, rupture) or malfunction of gauges reading tank volume. (DRAFT)

<!--[if !supportLists]-->4. <!--[endif]-->The volume of water in the influent storage tank should not exceed 75% of their maximum capacity of 21,000 gallons and the containment berm capacity should be maintained as required in Condition 2 above. The November 2016 Spill Plan proposes to use 90% of the volume capacity of each of the 21,000 gallon tanks (about 18,900 gallons). However, in our opinion, the containment berm for each tank should hold a water volume larger than the volume capacity of 1,885 gallons calculated in the November 2016 Spill Plan for each of the containment berms. (DRAFT)

Alternatively, LBNL may increase the volume capacity of the containment berm for each influent storage tank to at least hold 20% of the volume from each tank. The volume in each tank must not exceed 90% of 21,000 gallons which is the maximum capacity of each tank. (DRAFT)

<!--[if !supportLists]-->5. <!--[endif]-->Pumps and empty containers of adequate capacity must be available and maintained at all times at the WTS site and be readily accessible in case of a release from any of the influent storage tanks. This is to ensure that liquids accumulated in the containment berm are pumped and safely stored in containers before they overflow and impact other areas of the site. (DRAFT)

<!--[if !supportLists]-->6. <!--[endif]-->The November 2016 Spill Plan states that “[v]ehicular travel around the treatment system area is restricted to minimize a vehicular collision that may impact the system.” A fence should be installed to isolate and protect the influent storage tanks from vehicular traffic and potential impacts to the structural integrity of the tanks. (DRAFT)

Best,
Carmen
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"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss

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